**IN THE UNITED STATES DISTRICT COURT**
**FOR THE SOUTHERN DISTRICT OF TEXAS**
**HOUSTON DIVISION**

| | | |
|---|---|---|
| **UNITED STATES OF AMERICA** | § | |
| | § | |
| **VS.** | § | |
| | § | **CRIMINAL NO: 4:07-CR-00065** |
| **JOEL HERNALDO PAREDES-GOMEZ** | § | |
| | § | |
| | § | |

**UNOPPOSED MOTION FOR CONTINUANCE**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**COMES NOW, JOEL HERNALDO PAREDES-GOMEZ, et al,** by and through his attorney of record WENDELL A. ODOM, JR., and would request this honorable Court grant a continuance in this cause and for grounds thereof would show the Court the following:

**I**

The case is set for sentencing on Friday, September 28, 2012 at 10:00 a.m.

**II**

Counsel would show that this case is a complex multiple division and multiple district case involving Conspiracy to Distribute for the Purpose of Unlawful Importation of More than 5 Kilograms of Cocaine and Distribution for Purpose of Unlawful Importation of Cocaine in violation of U.S.C. 21 § 959 (a) 960, 9 and 18.

**III**

Counsel for defendant will be in Orlando, Florida for a prepaid trip and will need additional information for sentencing.

The Defendant respectfully request that this Court grant an extension for the aforementioned reasons and would show that the ends of justice would best be served by the granting of such continuance and that the granting of such continuance outweighs the best interest of the public and the Defendant to a speedy trial pursuant to Title 18 U.S.G.C., Section 3161(h)(8)(A).

**IV**

Counsel has spoken with the Assistant United States Attorney in this cause, James Sturgis, and he has no objection to this request.

**V**

This motion is made in the interest of justice and not for the purposes of delay.

**WHEREFORE, PREMISES CONSIDERED,** Defendant requests this honorable Court to grant this **Unopposed Motion for Continuance** and reschedule this case until the 9th of November 2012.

**Respectfully submitted,**

**/S/ Wendell A. Odom, Jr.**
**WENDELL A. ODOM, JR.**
**TBA #15208500**
**Federal Bar #947**
Attorney for Defendant #3
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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Unopposed Motion for Continuance** was filed electronically with the United States District Court Clerk and same was electronically forwarded to the Assistant United States Attorney as well as to counsel as identified below on this the 30th day of August, 2012:

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**WENDELL A. ODOM, JR.**

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Attorney for Defendant #6
John Alex Marroquin-Patino

## CERTIFICATE OF CONFERENCE

Counsel for Defendant has spoken to the Assistant United States Attorney in this cause, James H. Sturgis, and he has no objection to a continuance.

**/S/ Wendell A. Odom, Jr.**
**WENDELL A. ODOM, JR.**